



U.S. Department
of Transportation

Federal Motor Carrier
Safety Administration

400 - Seventh St., SW
Washington, DC 20590

DEC 1 2003

Refer to: MC-PSV

FMCSA-2004-18940-1

Mr. Adam T. Wegel
Business Development Manager
Delphi Corporation
800 West El Camino Real, Suite 240
Mountain View, California 94040

Dear Mr. Wegel:

This is in response to your August 18, 2003, letter requesting clarification of § 395.15 of the Federal Motor Carrier Safety Regulations (FMCSRs). Your questions concerned the Automated Driver Log application that MobileAria, a Delphi Company, is developing for its Truck Productivity Computer (TPC).

We have reviewed the information you supplied about your software and TPC. However, you should note the Federal Motor Carrier Safety Administration does not test, evaluate, endorse or approve products. Therefore, our responses to your questions should not be construed as an endorsement or approval of your company's products and services. We repeat your questions below, followed by our response.

Question 1: The TPC reads data from the J1708/1939 vehicle [data] bus. The vehicle bus provides engine use (hours), road speed (mph), and miles driven (odometer). Once per day, the TPC updates the date and time from GPS [Global Positioning System]. Does the above capability appear to meet the requirements of Section 395.2, "At a minimum, the device must record engine use, road speed, miles driven, the date, and time of day."

Response 1: We believe the proposed implementation, using the J1708 data bus, or the J1939 high-speed data bus, would meet the requirements of §395.2. The device and its implementation must also comply with the requirements of §395.15 if the system will be used in lieu of logbooks. Please note especially the requirement for recording the time and location of each change of duty status.

Question 2: Does the display in Exhibit 2 appear to meet the requirements of §395.15(b)(1)?

Response 2: We do not believe the display would meet the requirements of § 395.15(b)(1). Although §395.15(b)(1) covers the general information requirements for automatic on-board recording devices, the device must also comply with §395.15(i), the performance requirements. The sample illustration you provided does not show "total miles driving today" as required by § 395.15(i)(5)(iii). The sequence of events appears to show changes at the top of the hour. Although §395.15(i)(5) does not specify the

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precision of the display, please note that §395.15(b)(3) requires information support systems (separate from the on-board device) to comply with the requirements of §395.8(d). The "graph grid" must show the time to the nearest 15 minutes.

Question 3: Does the display in Exhibit 3 appear to meet the requirements of §395.15(b)(2)?

Response 3: Please refer to the response to Question 2. Also, it is not clear how the device will handle the entry of the location of each change in duty status, required under §395.15(d). Enclosed is a copy of recent Regulatory Guidance the FMCSA has issued on this subject.

I hope this information is helpful. If you need further assistance, please contact Deborah M. Freund, Senior Transportation Specialist, at 202-366-5541 or deborah.freund@fmcsa.dot.gov.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Robert F. Proferes', with a long horizontal line extending to the right.

Robert F. Proferes
Director, Office of Bus and Truck
Standards and Operations

Enclosure